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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 EXXON MOBIL CORPORATION,

Case No. 2:22-cv-03225(DMG MRWx)

17 Petitioner/Plaintiff,

**DECLARATION OF BRENTON
KELLY IN SUPPORT OF
MOTION TO INTERVENE**

18 SANTA BARBARA COUNTY
19 BOARD OF SUPERVISORS,

Hon. Dolly Gee

20 Respondent/Defendant,

Hearing: October 21, 2022
Time: 9:30 a.m.
Place: Courtroom 8C,
350 West 1st Street, Los Angeles

21 and

22 ENVIRONMENTAL DEFENSE
23 CENTER, GET OIL OUT!, SANTA
24 BARBARA COUNTY ACTION
NETWORK, SIERRA CLUB,
SURFRIDER FOUNDATION,
25 CENTER FOR BIOLOGICAL
DIVERSITY, and WISHTOYO
26 FOUNDATION,

27 Proposed Defendant-
Intervenors.

1 I, Brenton Kelly, declare as follows:

2 1. My name is Brenton Kelly. I am over 18 years old. I have personal
3 knowledge of the following facts and if called as a witness, would testify to these
4 facts under oath.

5 2. I currently live in Cuyama, California. I have lived in Santa Barbara
6 County for 42 years, and I have lived in Cuyama for the past 14 years.

7 3. During my time in Cuyama I have been employed by Quail Springs,
8 an educational 501c3 nonprofit organization, providing environmental science
9 and permaculture education for youth and adults. Additionally, I direct Quail
10 Springs' groundwater advocacy work. I am the Chairperson of the Stakeholders
11 Advisory Committee to the Cuyama Basin Groundwater Sustainability Agency
12 advocating for valley residents' concerns.

13 4. I am a current member of the Environmental Defense Center.

14 5. I drive State Route 166 regularly between Cuyama and Santa Maria.
15 I make a concerted effort to choose the least traffic times for the safety of my
16 passengers and myself. As chairperson of the Cuyama Valley Community
17 Association ("CVCA") I have facilitated numerous discussions regarding
18 highway safety on the 166. The CVCA has submitted comments to Santa Barbara
19 County, California Highway Patrol and Caltrans regarding traffic safety issues
20 from passing lanes to patrol cars. The 166 is in close proximity to the Cuyama
21 River, with numerous crossings over the River. The Route runs for many miles
22 through the Los Padres National Forest, and is an environmentally sensitive
23 corridor.

24 6. Having lived on the Gaviota coast and in Cuyama, I have witnessed
25 the impacts of oil and gas development, including offshore production leaks,
26 pipeline ruptures, and trucking traffic accidents. Santa Barbara County has made
27 progressive commitments to reducing these risks and developing renewable

1 energy production. I am in support of these efforts and the further reduction of
2 petroleum extraction and dependency in our region.

3 7. Route 166 is a busy trucking route between the coast and the central
4 valley. There are no passing lanes and very few passing zones. Slower
5 commercial traffic combines with speeding commuter traffic to produce a very
6 dangerous highway. As the 166 passes through Old and New Cuyama it passes
7 directly in front of the entrances to the elementary and high school campuses of
8 the Cuyama Joint Unified School District, the library, the community health
9 center and the fire station. East of the townsites is the hazardous intersection of
10 Highways 33 and 166 which has no turn lane and is frequented by tourists,
11 motorcycle and bicycle traffic traveling scenic Highway 33.

12 8. From my personal experience driving regularly on Route 166 and
13 Highway 101, I know these roads cannot safely support the additional, daily
14 traffic of large oil tankers that is being proposed by ExxonMobil. These roads are
15 already dangerous—and I worry about my safety, the safety of my community
16 and the safety of the natural environment, if the project were to be allowed to
17 proceed.

18 9. On behalf of the CVCA, I attended and presented public comments
19 in objection to the project to both the Planning Commissioners and the County
20 Supervisors. Personally, I have shared information and my concerns about the
21 proposed project through our community Facebook page, *Cuyama Strong*, and I
22 have discussed my concern with residents in the valley and Quail Springs staff
23 members.

24 10. My personal and professional interests are specifically threatened by
25 the proposed oil trucking as it would directly contribute to increased risk of oil
26 spills, harm to wildlife, waters, and cultural resources, and the increased
27 likelihood of tragic accidents on this already overburdened highway that I
28 frequently use in addition to friends, family, co-workers and visitors to Quail

1 Springs. When I travel along Highway 101 and Route 166, I greatly enjoy the
2 wild and natural scenery of this region and the chance to observe wildlife in their
3 natural habitat. I also enjoy hiking and bird watching off portions of the route,
4 specifically along the Cuyama River and on the Buckhorn road at the Rock Front
5 Ranch. A court order upholding Santa Barbara County's decision to reject the
6 proposed trucking project will protect the safety of residents and the environment.
7 If the decision is not upheld, travelers and a precious stretch of environmentally
8 sensitive habitat will be put at considerable risk from traffic accidents and oil
9 spills, which would greatly reduce my use and enjoyment of this area.

10 I declare under penalty of perjury that the foregoing is true and correct to
11 the best of my knowledge, information, and belief.

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13 Executed at Cuyama, California, on August 29, 2022.

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16 Brenton Kelly

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